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17 *Attorneys for Plaintiffs REMARK*
18 *HOLDINGS, INC. and KANKAN LIMITED*

China Branding Group Ltd. (in Official
Liquidation)
c/o Grant Thornton Specialist Services
(Cayman) Ltd
10 Market Street #765, Camana Bay,
Grand Cayman

Joint Official Liquidators, Hugh Dickson,
Grant Thornton Specialist Services (Cayman)
Limited
10 Market Street No. 765
Camana Bay, Grand Cayman KY1 9006
Cayman Islands
-and-
David Bennett
Grant Thornton Recovery and
Reorganisation Limited
12th Floor, 28 Hennessy Road
Wanchai
Hong Kong SAR
+852 3987 1200
Pro Se Defendants

14 **UNITED STATES DISTRICT COURT**
15 **DISTRICT OF NEVADA**

16 REMARK HOLDINGS, INC., et al.,

17 *Plaintiffs,*

18 v.

19 CHINA BRANDING GROUP LIMITED (IN OFFICIAL
20 LIQUIDATION), et al.,

21 *Defendants.*

Case No. 2:18-cv-00322

**STIPULATION FOR
EXTENSION OF TIME FOR
CAYMAN DEFENDANTS TO
RESPOND TO COMPLAINT
(FIRST REQUEST)**

22 Pursuant to Fed. R. Civ. P. 12(a)(1) and LR IA 6-1, Remark Holdings, Inc., Kankan Limited,
23 and China Branding Group Limited (In Official Liquidation), an exempted Cayman Islands company
24 acting by and through its joint official liquidators (“CBG”), and the Joint Official Liquidators, with
25 no personal liability, Hugh Dickson of Grant Thornton Specialist Services (Cayman) Ltd, and David
26 Bennett of Grant Thornton Recovery and Reorganisation Ltd (the “JOLs,” and together with CBG,
27 the “Cayman Defendants”) hereby stipulate to the extension of the Cayman Defendants’ time to
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1 respond to the Complaint to **June 29, 2018**. In support of this stipulation, the undersigned parties
2 state as follows:

3 1. On May 10, 2018, the Bailiff of the Grand Court of the Cayman Islands (the “Grand
4 Court”) attempted to effect service of the Summons and Complaint on each of the Cayman
5 Defendants, as demonstrated by the Affidavits of Service dated May 11, 2018 [ECF Nos. 27–29],
6 and their time to respond to the Complaint would otherwise be May 31, 2018.

7 2. CBG does not contest service of the Summons and Complaint. The JOLs do not
8 believe that service of the Summons and Complaint has properly been made upon them. However,
9 the JOLs are voluntarily electing to waive service of the Summons and Complaint.

10 3. Pursuant to Section 110(2) of the Companies Law (2018 Revision) of the Cayman
11 Islands, “The official liquidator may – (a) with the sanction of the Court, exercise any of the powers
12 specified in Part I of Schedule 3 ...” [*Emphasis added*]. That Schedule states “SCHEDULE 3, Powers
13 of Liquidators, Part I, Powers exercisable with sanction, 1. Power to bring or defend any action or
14 other legal proceeding in the name and on behalf of the company.”

15 4. Accordingly, the Cayman Defendants are obliged to seek approval from the
16 Liquidation Committee of CBG, following which the Cayman Defendants must apply to the Grand
17 Court for sanction to defend this proceeding and retain U.S. counsel. That process has been
18 commenced, and the Cayman Defendants have requested an extension of their time to respond to the
19 Complaint in order to obtain those approvals. Should the above approvals not be received by June
20 29, 2018, a further extension may be required.

21 5. This is the undersigned parties’ first request for an extension.
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24 DATED: June 11, 2018
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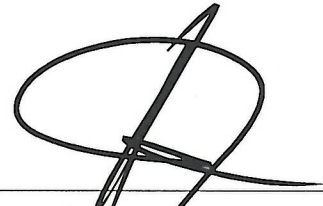
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JOINT OFFICIAL LIQUIDATORS, with no
personal liability, HUGH DICKSON OF
GRANT THORNTON SPECIALIST
SERVICES (CAYMAN) LTD, and DAVID
BENNETT OF GRANT THORNTON
RECOVERY AND REORGANISATION
LTD

for and on behalf of
CHINA BRANDING GROUP LIMITED
(IN OFFICIAL LIQUIDATION)

Pro se Defendants

1 UNITED STATES DISTRICT COURT
2 DISTRICT OF NEVADA

3 REMARK HOLDINGS, INC., et al.,

4 *Plaintiffs,*

5 v.

6 CHINA BRANDING GROUP LIMITED (IN OFFICIAL
7 LIQUIDATION), et al.,

8 *Defendants.*

Case No. 2:18-cv-00322

**ORDER ON STIPULATION FOR
EXTENSION OF TIME FOR
CAYMAN DEFENDANTS TO
RESPOND TO COMPLAINT
(FIRST REQUEST)**

11 The Court, having considered the above stipulation of the parties, and good cause appearing,
12 finds as follows:

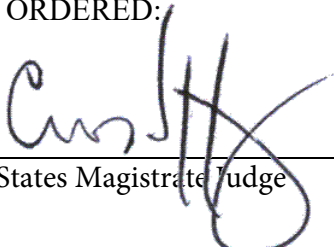
13 1. Defendant China Branding Group Limited (In Official Liquidation), an exempted
14 Cayman Islands company acting by and through its joint official liquidators, with no personal liability
15 (“CBG”) was validly served with the Summons and Complaint on May 10, 2018. The Joint Official
16 Liquidators, Hugh Dickson of Grant Thornton Specialist Services (Cayman) Ltd, and David Bennett
17 of Grant Thornton Recovery and Reorganisation Ltd (the “JOLs,” and together with CBG, the
18 “Cayman Defendants”), dispute that they have been properly served with the Summons and
19 Complaint, however, the JOLs have agreed to voluntarily accept service of the Summons and
20 Complaint. The Cayman Defendants’ time to respond to the Complaint would otherwise be May 31,
21 2018.

22 2. The Cayman Defendants have requested an extension in order to obtain approvals of
23 CBG’s Liquidation Committee and the Grand Court of the Cayman Islands (the “Grand Court”),
24 which approvals are required to enable the Cayman Defendants to defend this proceeding and retain
25 U.S. counsel. That approval process has been commenced but the Cayman Defendants have not yet
26 received the approval of the Liquidation Committee and the Grand Court.

27 3. This is the undersigned parties’ first request for an extension
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1 IT IS ORDERED THAT the Cayman Defendants shall have until **June 29, 2018** to file a
2 response to the Complaint.

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4 IT IS SO ORDERED:

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7 _____
United States Magistrate Judge

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9 DATED: June 22, 2018
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